

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff

v.

WASHINGTON GROUP
INTERNATIONAL, INC.,

Defendant.

Docket No. 04-12097-GAO

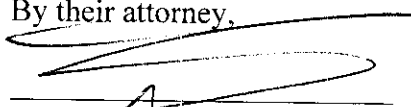
MOTION TO INTERVENE AS PLAINTIFFS AND ADD AS DEFENDANTS,
RON BENNETT, MICHAEL FOGARTY, AND DENNIS WOODRUFF

NOW COME Leonard Bell, John Baldwin, Wayne Henderson and Johannes Kaindoh ("Intervenors"), and hereby move this Honorable Court to issue an order permitting them to intervene as plaintiffs in this action and to file a complaint, pursuant to Fed. R. Civ. P. 24 (a) and to add as defendants, Ron Bennett, Michael Fogarty, and Dennis Woodruff, pursuant to M.G. L. c. 151B and other relevant common law claims.

IN SUPPORT THEREOF, the Intervenors submit the attached Memorandum of Law and Affidavit of Todd J. Bennett.

Respectfully submitted,
Leonard Bell,
John Baldwin,
Wayne Henderson and
Johannes Kaindoh
By their attorney,

Dated: November 23, 2004


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